

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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GIRARD STREET INVESTMENT  
HOLDINGS LLC,

Plaintiff,

v.

Case No. 1:23-cv-10772-JSR

PETRÓLEOS DE VENEZULA, S.A. and  
PDVSA PETRÓLEO S.A.,

Defendants.

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**NOTICE OF NON-PARTIES PDV HOLDING, INC., CITGO HOLDING, INC., AND  
CITGO PETROLEUM CORPORATION'S CROSS-MOTION TO QUASH OR  
STAY POST-JUDGMENT DISCOVERY**

PLEASE TAKE NOTICE that pursuant to Fed. R. Civ. P. 26, 34, 45, and 69, and N.Y. C.P.L.R. 2304, 3103 and 5224, and upon the accompanying Memorandum of Law and the exhibits attached thereto, Non-Parties PDV Holding, Inc., CITGO Holding, Inc., and CITGO Petroleum Corporation will move this Court before the Honorable Jed S. Rakoff, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl St., New York, NY 10007, on a date and time to be set by the Court, for entry of the accompanying Proposed Order.

Dated: September 5, 2024

Respectfully submitted,

By: /s/ Nathan P. Eimer

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